

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

v.

DANIEL LARA-SALAZAR

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Case No.: 1:25-cr-085-MJM

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**MOTION TO WITHDRAW AS COUNSEL FOR THE DEFENDANT
AND MOTION TO FILE A SEALED DOCUMENT**

COMES NOW the Defendant by and through his attorneys, Jennifer E. Smith and Gary E. Proctor, and respectfully requests that this Honorable Court permit Ms. Smith and Mr. Proctor to withdraw as counsel of record. In support thereof, counsel state as follows:

1. Motions are due today, August 4, 2025.
2. The undersigned met with the Defendant on August 1, 2025 at his place of incarceration. At said meeting, counsel learned of a non-waivable conflict that require both he and Ms. Smith to withdraw from further representation of Mr. Lara-Salazar.
3. Revealing the nature of said conflict in a public pleading would violate the Rules of Professional Conduct. Counsel submits that the interests of the public in viewing Court documents is outweighed by the Attorney-Client privilege. Accordingly, counsel thereby requests that the Court allow the filing under seal of a Proposed Sealed Document contemporaneously with this filing.
4. The undersigned has spoken with CJA Supervising Attorney Alyssa Thorn who has authorized him to state that should the Court grant this motion she will promptly identify replacement counsel.

WHEREFORE, the Defendant prays this Honorable Court grants counsels' motion to withdraw and that alternate CJA Counsel be appointed. Counsel further requests that all deadlines of this Court be held in abeyance until new counsel is identified. A Proposed Order is attached.

Respectfully submitted,

/s/

Gary E. Proctor (Bar No. 27937)
Jennifer E. Smith (Bar No. 20767)
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this day, August 4, 2025, a copy of the attached was served on all parties via ECF.

/s/

Gary E. Proctor